

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

WOODROW JACKSON,)
)
Plaintiff,)
)
v.)
)
AUTO-OWNERS INSURANCE)
COMPANY,)
)
Defendant.)

CIVIL ACTION FILE NO.:

**AUTO-OWNERS INSURANCE COMPANY'S
SPECIAL APPEARANCE NOTICE OF REMOVAL**

COMES NOW, Auto-Owners Insurance Company ("Auto-Owners"), by way of special appearance, and petitions for removal of the action herein referred from the Superior Court of Brooks County, Georgia to the United States District Court for the Middle District of Georgia, Valdosta Division, and respectfully shows the Court the following:

1.

Auto-Owners is the sole defendant in a civil action brought against it in the Superior Court of Brooks County, Georgia and styled *Woodrow Jackson v. Auto-Owners Insurance Company*, Civil Action File No. 24CV00285, now pending in

said court. Copies of the Summons and Complaint in that action are attached hereto, marked, respectively, Exhibits “A” and “B”, and are made a part hereof.

2.

Following the filing of the Summons and Complaint, upon Plaintiff's motion, the Superior Court of Brooks County, Georgia appointed a special process server for the purpose of perfecting service of process upon Auto-Owners in said action. Copies of the Motion for Appointment of Special Process Server and Order Appointing Special Process Server are attached hereto, marked, respectively, Exhibits “C” and “D”, and are made a part hereof.

3.

Said action was then commenced by service of process consisting of said Summons and Complaint upon Auto-Owners through its registered agent on November 25, 2024. The Affidavit of Service, executed by the special process server and filed with the Clerk of Court for the Superior Court of Brooks County, Georgia in said action, is attached hereto, marked Exhibit “E”, and made a part hereof. This Petition is timely filed within thirty (30) days of such service of process upon Auto-Owners.

4.

Auto-Owners timely filed responsive pleadings to said Complaint in the Superior Court of Brooks County, Georgia. Copies of the Special Appearance Answer, Special Appearance Motion to Dismiss, and Brief in Support, filed by Auto-Owners in said action, are attached hereto, marked, respectively, Exhibits "F", "G", and "H", and made a part hereof.

5.

The attached Summons, Complaint, Motion for Appointment of Special Process Server, Order Appointing Special Process Server, Affidavit of Service, Special Appearance Answer, Special Appearance Motion to Dismiss, and Brief in Support constitute all pleadings that have been filed in said Superior Court of Brooks County, Georgia.

6.

There is diversity of citizenship among the parties. This is a controversy between Plaintiff, a citizen and resident of Georgia, and Auto-Owners, a corporation that is not a citizen of the State of Georgia, wherein this action was brought, but rather is a citizen of the State of Michigan, wherein it is incorporated

and maintains its principal place of business located at 6101 Anacapri Boulevard, Lansing, Michigan 48917.

7.

As is set forth in the Complaint and the attachments thereto, the amount in controversy exceeds the sum or value of SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), exclusive of interest and costs.

8.

Accordingly, this is a civil action brought in the Superior Court of Brooks County, Georgia for which this Court has original jurisdiction pursuant to Section 1332 of Title 28 of the United States Code due to diversity of citizenship of the parties as well as the amount in controversy.

9.

Auto-Owners has given written notice of the filing of the Notice of Removal to Plaintiff and to the Clerk of the Superior Court of Brooks County, Georgia in proper accordance with Section 1446(d), Title 28 of the United States Code. A copy of this Notice of Filing of Notice of Removal is attached hereto as Exhibit "I".

WHEREFORE, Auto-Owners prays that this petition be filed, and that said action be removed to and proceed in this Court, and that no further proceedings be had in said case in the Superior Court of Brooks County, Georgia.

Respectfully submitted this 19th day of December, 2024.

CHARTWELL LAW, LLP

/s/ Karen K. Karabinos
Karen K. Karabinos
Georgia Bar No. 423906

/s/ Katelyn E. Fischer
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Counsel for Auto-Owners

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing *Defendant Auto-Owners Insurance Company's Special Appearance Notice of Removal* via electronic filing using the Court's electronic filing system, which will send notification and a copy to the counsel of record as follows:

Brian Braddy
YOUR INSURANCE ATTORNEY, PLLC
3384 Peachtree Rd NE
Suite 250
Atlanta, GA 30326
BPB@yourinsuranceattorney.com

This 19th day of December, 2024.

CHARTWELL LAW, LLP

/s/ Karen K. Karabinos
Karen K. Karabinos
Georgia Bar No. 423906

/s/ Katelyn E. Fischer
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